

## MODULE 10. VOLUNTEER AND CONTRACT STAFF MANAGEMENT

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### GENERAL CONSIDERATIONS

- Contractors and volunteers provide important services to the inmate population and to the agency during routine operations. During a pandemic, the importance of on-site services must be balanced with the risk of infection being introduced into an inmate population or office setting by a visitor from the community.
- Pandemics may also create a greater need for such services when contingency or crisis situations arise due to a higher demand for services, increased numbers of sick employees or contractors, a need for alternate care facilities at an institution, etc... Thus, contractors and volunteers need to be considered as viable options for addressing agency and institution needs.
- Central Office Executive Staff will need to make overall agency decisions related to the role of contractors and volunteers during a pandemic. However, within the framework of those general decisions, individual institution needs and contracting decisions will be made locally in consultation with Regional leadership.

### ESSENTIAL VOLUNTEERS AND CONTRACTORS

- **ESSENTIAL SERVICES MAY INCLUDE:** Medical services, mental health services, religious services (if unable to provide remote services), and critical infrastructure repairs.
- Volunteers and contractors performing essential services or maintenance on essential systems may continue entering the institution. All General Guidance for Inmate Visitation applies to contractors and volunteers, including screening for COVID-19 symptoms using the same procedures for staff prior to entry.
  - ➔ Refer to **MODULE 9, Inmate Visitation**, for general information and procedures regarding visits.
  - ➔ See the *Visitor/Volunteer/Contractor COVID-19 Screening Tool* in the Appendices.
- Volunteers and contractors who feel ill should be instructed not to report to the institution, but notify their point of contact at the institution.

### BACKGROUND INVESTIGATIONS AND SECURITY CLEARANCE

- When determining clearance requirements for non-BOP individuals, refer to the following **BOP Information Security Programs policy (PS1237.16)**:

#### **3.3 Non-BOP Individuals (Contractors and Volunteers)**

***Certain non-BOP individuals do not require a clearance to perform the following:***

- Low-risk services such as an initial installation of IT systems where no data is resident.



- Low-risk services such as infrequent maintenance or repairs of IT systems where no data is resident.
  - Moderate-risk medical non-BOP individuals, working in Health Services, as long as the individual is only accessing information normally used in the course of providing professional medical services (no computer/system access).
  - Individuals who enter a BOP facility no more than 52 days in a 12-month period.
- In deployment of this **PANDEMIC RESPONSE PLAN**, laws and regulations applicable to background investigations and security clearance must be followed. Institutions are encouraged to begin this clearance process upon identification of the volunteer or contractor, so as to avoid delays in allowing access to the institution or performing work.
  - Human Resources staff should be available to quickly and efficiently obtain all documentation, including a pre-employment waiver, to initiate and complete the clearance process as quickly and efficiently as possible.
  - For Health Services contractors requested or utilized under this plan, computer access and electronic health record (EHR) training should be initiated as soon as permissible so that contractors can perform their work with the appropriate documentation.
  - All non-BOP individuals must always be monitored and escorted by staff knowledgeable about the work being performed.
  - A signed non-disclosure agreement and an Information Security briefing must be completed prior to work being performed. All pre-employment requirements, as stated in HSPD-12 DOJ regulations, and BOP employment policy apply (an NCIC, fingerprint check, or any other local entrance or visiting procedures).
  - All non-BOP individuals not meeting the categories listed in PS 1237.16 Section 3.3 must have a security clearance commensurate with their access. Non-BOP individuals who access a BOP IT system also need a PIV card. Documentation is maintained in the contractor/volunteer security file.
  - **NATIONAL GUARD ASSISTANCE:** In some cases, it may be necessary to utilize National Guard assets authorized by their respective state governors. In this instance, additional clearances may not be required.
  - Any questions regarding clearances should be directed to Security and Background Investigation Section of the Human Resources Management Division or to the Chief Information Officer in Information, Policy, and Public Affairs Division.

## NON-ESSENTIAL VOLUNTEERS AND CONTRACTORS

Consideration should be given to limit access to the facility by non-essential volunteers and contractors.

➔ Refer to **MODULE 9, Inmate Visitation**, for information regarding personal and legal visits.